

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

IN RE: GERBER PRODUCTS COMPANY  
HEAVY METALS BABY FOOD  
LITIGATION

Master File No. 1:21-cv-00269 (MSN/JFA)

This Document Relates to ALL Cases

**PLAINTIFFS' MOTION TO SEAL MOTION TO COMPEL NESTLÉ  
DOCUMENTS, CUSTODIANS, AND SUBSTANTIAL COMPLETION  
DATE**

Plaintiffs, pursuant to Local Civil Rule 5, hereby move to seal portions of Plaintiffs' Motion to Compel Nestlé Documents, Custodians, and Substantial Completion Date, as well as Exhibits A attached thereto. The facts and law supporting the granting of this motion to seal are contained in Plaintiffs' Memorandum in Support of Plaintiffs' Motion to Seal Plaintiffs' Motion to Compel Nestlé Documents, Custodians, and Substantial Completion Date.

Dated: August 26, 2022

By: /s/ Steven J. Toll

Steven J. Toll  
**COHEN MILSTEIN SELLERS &  
TOLL, PLLC**  
1100 New York Ave.  
NW East Tower, 5th  
Floor Washington, DC  
20005  
Telephone: (202) 408-4600  
Facsimile: (202) 408-4699

Rosemary M. Rivas  
**GIBBS LAW GROUP LLP**  
1111 Broadway, Suite 2100  
Oakland, CA 94607  
Telephone: 510-350-9700  
Facsimile: 510-350-9701

Janine Pollack  
**CALCATERRA POLLACK LLP**  
1140 Avenue of the Americas,  
9th Floor  
New York, New York  
10036 Telephone: 212-  
899-1765  
Facsimile: 332-206-2073

*Plaintiffs' Interim Co-Lead Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 26, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

By: /s/ Steven J. Toll

Steven J. Toll  
**COHEN MILSTEIN SELLERS &  
TOLL, PLLC**  
1100 New York Ave.  
NW East Tower, 5th  
Floor Washington, DC  
20005  
Telephone: (202) 408-4600  
Facsimile: (202) 408-4699